



# Air Resources Board



**Matthew Rodriquez**  
Secretary for  
Environmental Protection

**Mary D. Nichols, Chair**  
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Sacramento, California 95812 • [www.arb.ca.gov](http://www.arb.ca.gov)

**Edmund G. Brown Jr.**  
Governor

April 12, 2017

Ms. Alexis Strauss  
Acting Regional Administrator  
Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Dear Ms. Strauss:

The California Air Resources Board (CARB) is submitting to the U.S. Environmental Protection Agency (U.S. EPA) the 2008 8-Hour Ozone Attainment Plan for San Diego County (Ozone Plan) and the 2008 8-Hour Ozone Reasonably Available Control Technology State Implementation Plan for San Diego County (RACT SIP) prepared by the San Diego County Air Pollution Control District (District).

The District adopted the Ozone Plan on December 14, 2016. Following the District's conclusion, at a public hearing held on March 23, 2017, CARB adopted the Ozone Plan as a revision to the California State Implementation Plan (SIP). No comments were received during the CARB hearing.

This package consists of one hard copy and one compact disc with an exact duplicate of the hard copy materials listed below:

- I. December 27, 2016 letter from Mr. Robert Kard, District Air Pollution Control Officer, to Mr. Richard Corey, CARB Executive Officer, including:
  - a. SIP Completeness Checklist;
  - b. District Board Agenda Letter;
  - c. District Board Resolution;
  - d. Evidence of District Board Public Hearing;
  - e. District Board Minute Order;
  - f. Ozone Plan with Attachments;
  - g. RACT SIP with Attachments; and
  - h. Workshop Report.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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- II. Public notice for CARB public meeting to consider the approval of the Ozone Plan.
- III. CARB Staff Report, *CARB Review of the 2008 8-Hour Ozone Attainment Plan for San Diego County*.
- IV. CARB Resolution 17-6 adopting the Ozone Plan as a revision to the California SIP.
- V. CARB Executive Order S-17-004 adopting the RACT SIP as a revision to the California SIP.

The Ozone Plan includes on-road motor vehicle emission budgets. To ensure that any future updates to these budgets are used expeditiously in the conformity process, we request that U.S. EPA allow budgets to be replaced upon a finding of adequacy. To accomplish this, we ask U.S. EPA to limit its approval of the budgets submitted today to last only until the effective date of future U.S. EPA adequacy findings for replacement budgets.

Without the ability to replace the applicable emissions budgets with submitted budgets found adequate using the budget adequacy process, the benefits of using the updated data may not be realized for a year or more after the SIPs are submitted, due to the SIP approval process. We appreciate U.S. EPA's willingness to work with us in our efforts to utilize motor vehicle emission budgets based on the most up-to-date, accurate data as soon as possible upon availability.

RACT SIP analyses are required for specific stationary sources for which U.S. EPA has published Control Technique Guidelines (CTG), and for major non-CTG stationary sources. Following U.S. EPA requirements, the District reviewed its existing stationary source rules to determine if those rules continue to meet RACT requirements. The District RACT SIP shows that all RACT requirements are satisfied. CARB staff reviewed the RACT SIP for technical adequacy and completeness, as indicated on the SIP Completeness Checklist included with the District submittal package.

CARB is committed to working with U.S. EPA staff to provide any additional clarifying information needed. If you have any questions, please call Mr. Kurt Karperos, Deputy

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CARB is committed to working with U.S. EPA staff to provide any additional clarifying information needed. If you have any questions, please call Mr. Kurt Karperos, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Ms. Karen Magliano, Chief, Air Quality Planning and Science Division, at (916) 322-5350.

Sincerely,

  
Richard W. Corey  
Executive Officer

Enclosures

cc: (w/o enclosures)

Ms. Elizabeth Adams  
Acting Director  
Region 9, Air Division  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Mr. Robert Kard  
Air Pollution Control Officer  
10124 Old Grove Rd  
San Diego, California 92131

Mr. Kurt Karperos  
Deputy Executive Officer  
California Air Resource Board

Ms. Karen Magliano, Chief  
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